

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK**

ASMAA ALQAISSI, HAIMAN BAKIR
SUDKI ABDULHAMEED AND IMAN
HAIMAN BAKIR SUDKI

Petitioners,

Case No. 17-cv-00487

v.

DONALD TRUMP, President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY (“DHS”); U.S.
CUSTOMS AND BORDER PROTECTION
(“CBP”); JOHN KELLY, Secretary of DHS;
KEVIN K. MCALEENAN, Acting
Commissioner of CBP; and JAMES T.
MADDEN, New York Field Director, CBP,

NOTICE OF MOTION

Date: January 29, 2017

Respondents.

PLEASE TAKE NOTICE that, upon Declaration of Tahanie A. Aboushi, Esq.
dated January 29, 2017, and the memorandum of law dated January 29, 2017, and upon
all prior pleadings herein, Petitioners ASMAA ALQAISSI, HAIMAN BAKIR SUDKI
ABDULHAMEED AND IMAN HAIMAN BAKIR SUDKI will move this Court at the
United States District Court for the Easter District of New York, located at 225 Cadman
Plaza East Brooklyn, New York 11201 at a date and time to be determined by the Court,
for a decision and order granting an Emergency Preliminary Injunction and a Temporary
Restraining Order pursuant to Rule 65 of the Federal Rules of Civil Procedure.

DATED: NEW YORK, NEW YORK
January 29, 2017

Respectfully submitted,

THE ABOUSHI LAW FIRM, PLLC.

/s/

By: Tahanie A. Aboushi, Esq.

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